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GLOBAL TECHNOLOGY SERVICES and
CHEVRONTEXACO OVERSEAS PETROLEUM

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDWARD McLAUGHLIN,

Plaintiff(s),

v.

CHEVRONTEXACO GLOBAL
TECHNOLOGY SERVICES;
CHEVRONTEXACO OVERSEAS
PETROLEUM; DOES 1-10, exclusive,

Defendant(s).

Case No. C 05-02190 JL

**STIPULATED REQUEST FOR AN ORDER
TO STAY LITIGATION PENDING
EXHAUSTION OF DEFENDANTS'
INTERNAL ALTERNATIVE DISPUTE
RESOLUTION PROCEDURES**

Complaint filed: May 27, 2005

Defendants CHEVRONTEXACO GLOBAL TECHNOLOGY SERVICES and
CHEVRONTEXACO OVERSEAS PETROLEUM (for the purposes of this pleading referred
to as "Defendants") and Plaintiff Edward McLaughlin, through their respective attorneys,
hereby join in this stipulated request to stay this litigation for six months while the parties
attempt to resolve this matter by exhausting Defendants' internal alternative dispute
resolution procedures.

After receiving Plaintiff's Complaint, Defendants communicated to Plaintiff
regarding their position that Defendants' employees are subject to Defendants' mandatory

internal grievance procedure entitled "Steps to Employee Problem Solution Process" ("STEPS"). (Declaration of Kerry McInerney Freeman In Support Of The Parties' Stipulated Request For An Order To Stay Litigation Pending Exhaustion Of Defendants' Internal Alternative Dispute Resolution Procedures ("Freeman Dec."), filed herewith, at ¶3).

In the interest of judicial economy and the spirit of cooperation, Defendants proposed that Plaintiff stipulate to staying the litigation to allow the parties to exhaust the STEPS procedures, and Plaintiff agreed. (Freeman Dec., ¶4.) The parties, who have already engaged in a mediation before Mark Rudy, anticipate that exhaustion of the STEPS proceedings will take approximately six months, and therefore request to stay this litigation for six months. (Freeman Dec., ¶5.)

Dated: August 4, 2005

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Professional Corporation

By: //s//
Kerry McInerney Freeman
Attorneys for Defendants
CHEVRONTEXACO GLOBAL
TECHNOLOGY SERVICES and
CHEVRONTEXACO OVERSEAS
PETROLEUM

Dated: August 4, 2005

HIGHMAN, HIGHMAN & BALL

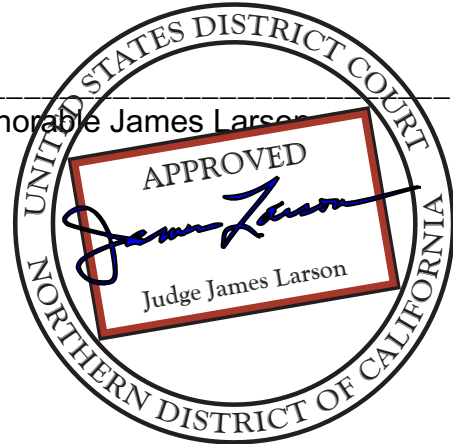
By: //s//
Bruce J. Highman
Attorneys for Plaintiff
EDWARD McLAUGHLIN

ORDER

PURSUANT TO THE PARTIES' STIPULATED REQUEST, IT IS ORDERED that litigation in this matter will be stayed for six months following service of this Order while the parties attempt to resolve this matter by exhausting Defendant's internal alternative dispute resolution procedures.

DATE: August 10, 2005

Honorable James Larson



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